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*Pro Hac Vice* Application Pending

Attorneys for defendants Mike Galam,  
Victor Galam, Jacqueline Galam Barnes,  
Rhino Bare Projects, LLC, Rhino Bare Projects  
4824 LLC and Crazy Horse Too Gentlemen's Club LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA, SOUTHERN DIVISION**

RUSSELL ROAD FOOD AND  
BEVERAGE, LLC, a Nevada limited  
liability company;

Plaintiff,

vs.

MICHAEL GALAM, an individual, et al.

Defendants.

**CASE NO.: 2:13-cv-00776 JCM (NJK)**

Assigned to the Hon. James C. Mahan

**DECLARATION OF BRYAN C.  
ALTMAN IN SUPPORT OF  
DEFENDANTS' RESPONSE TO  
ORDER TO SHOW CAUSE**

**Date: June 7, 2013**

**Time: No Appearance**

**Courtroom 6A**

**DECLARATION OF BRYAN C. ALTMAN**

I, BRYAN C. ALTMAN, declare as follows:

1. I am an attorney duly licensed to practice in all courts within the State of California. I am trial counsel for defendants Mike Galam, Victor Galam, Jacqueline Galam Barnes, Rhino Bare Projects, LLC, Rhino Bare Projects 4824 LLC and Crazy Horse Too Gentlemen's Club LLC. I have personal knowledge of the following facts and if called to testify I will testify truthfully and competently to the following facts:

2. Immediately after the Court entered its Preliminary Injunction Order on May 22, 2013, I informed Defendant Mike Galam of the Order and its ramifications and discussed with him all that needed to be done in order to be in compliance. During the following week, Mr. Galam and I spoke on multiple occasions about the Order, and I was convinced that he was doing all that was reasonable to comply.

3. On May 28, 2013, I received a letter by email from Mr. Tarabichi complaining of violations of the Preliminary Injunction Order. Attached hereto as Exhibit A is a true and correct copy of the May 28, 2013 letter from Mr. Tarabichi to myself and Michael Mushkin.

4. Following receipt of this letter, I immediately contacted Mr. Galam, relaying the contents of the letter and instructing him to verify that the Preliminary Injunction Order was being complied with.

6. Attached hereto as Exhibit C is a copy of Russell Road's opposition to the motion by the owner of three Crazy Horse gentlemen's clubs in Ohio filed in *Russell Road Food and Beverage, LLC v. Spencer*, Case No. 2:12-cv-01514-LRH-GWF (D. Nev) (Dkt #19).

7. Attached hereto as Exhibit D is a true and correct copy of a photograph I personally took of the marquee in front of the Riviera Hotel and Casino advertising a topless revue called "CRAZY GIRLS."

8. Attached hereto as Exhibit E is a true and correct copy of the website page for the Crazy Horse III viewable on the internet at [www.crazyhorse3.com](http://www.crazyhorse3.com).

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct. Executed this 7th day of June, 2013 at Los Angeles, California.

By: /s/ Bryan C. Altman  
BRYAN C. ALTMAN